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July 22, 2020

Via ECF

Hon. Analisa Torres
 United States District Judge
 500 Pearl Street, Room 15D
 United States Courthouse
 Southern District of New York
 New York, NY 10007

RE: Joint Letter Motion Requesting Extension of Current Case Schedule, *Essar Steel Algoma, Inc. v. Southern Coal Sales Corporation*, Case No. 1:17-mc-00360-AT-RL

Dear Judge Torres:

Plaintiff Essar Steel Algoma, Inc. (“Algoma”) and Defendants Nevada Holdings, Inc., f/k/a Southern Coal Sales Corporation; James C. Justice Companies, Inc.; James C. Justice Companies, LLC; Bluestone Industries, Inc.; Bluestone Coal Corporation; Bluestone Mineral, Inc., f/k/a Mechel Bluestone; Bluestone Energy Sales Corporation, A&G Coal Corporation, Tams Management Inc.; Encore Leasing LLC; Bluestone Resources Inc.; Justice Family Farms, LLC; and Southern Coal Corporation (collectively, “Southern Coal”) request an extension of the current case schedule. The parties have reached a settlement in principle and are in the process of drafting a settlement agreement and related documents.

The parties request that all case deadlines be extended by forty-five (45) days, by which time the parties expect to submit a stipulated dismissal for Your Honor to enter. The current deadlines (per Your Honor’s June 2, 2020 Order, dkt. 173) and proposed deadlines are below:

Event	Current Deadline	Proposed Deadline
Plaintiff to complete depositions of Defendants’ expert witnesses	July 31, 2020	September 14, 2020
Plaintiff shall serve Rule 56.1 Statement	August 14, 2020	September 28, 2020
Defendants shall respond to Plaintiff’s Rule 56.1	August 28, 2020	October 12, 2020

Kip.Bollin@ThompsonHine.com Fax: 216.566.5800 Phone: 216.566.5786

kb 4833-1492-5193.3

THOMPSON HINE LLP
 ATTORNEYS AT LAW

3900 Key Center
 127 Public Square
 Cleveland, Ohio 44114-1291

www.ThompsonHine.com
 O: 216.566.5500
 F: 216.566.5800



Hon. Analisa Torres
July 22, 2020
Page 2

Statement		
Plaintiff shall file a pre-motion letter regarding summary judgment	September 4, 2020	October 19, 2020
Defendant shall respond to Plaintiff's pre-motion letter	September 11, 2020	October 26, 2020
Case management conference	September 17, 2020	November 1, 2020

This is the first request for an extension of the deadlines set forth in Your Honor's June 2, 2020 Order.

Very truly yours,

/s/ Kip T. Bollin
Counsel for Essar Steel Algoma, Inc.

/s/ Lee D. Schneider (per email consent 7/22/20)
Counsel for Defendants

cc: All counsel of record (*via ecf*)